DECLARATION OF JEFFREY MARTIN
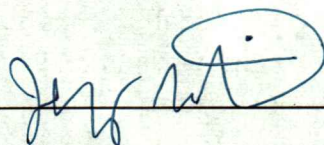
The undersigned, Jeffrey Martin, declares as follows:

1. I have been asked by counsel for defendants Rangel-Rubio to review the construction and implementation of the Master Jury Wheel that was used to select Grand Jurors in this case and will be used to select Trial Jurors in this case.

2. I previously supplied a declaration dated March 17th, 2021.

3. On March 18th, 2021 I received my first dose of Covid-19 vaccine and will receive my second dose on April 9th, 2021. According to the Center for Disease Control and Prevention, I will be fully vaccinated on April 23rd, 2021.

4. Because of my health conditions including asthma and age, I have been very careful to limit my risk of being infected with Covid-19 or transmitting it to my family. I have been very pro-active in getting the vaccine once I was allowed by the State of Georgia. It would be disappointing to contract Covid-19 so close to being fully vaccinated.

5. However, because of the deadline to supplement my declaration by April 2nd, 2021, because I am not allowed to access the data in my office as I am in the other twenty cases I am currently working on, and because I want to provide as much information as possible in this case, I scheduled an appointment to review data and use the newly licensed Excel spreadsheet software provided in the Richard B. Russell Federal Building.

6. On March 26th, 2021 I returned to the Richard B. Russell Federal Building, reviewed data, and used the newly licensed Excel spreadsheet software.

7. This accommodation was appreciated and allowed me to verify some of the hand counts that I previously made.

8. However, this accommodation does not allow me to analyze the data in the same way or as completely as I do for other cases. Specifically, I cannot use database software to analyze important systematic factors that require database software to analyze data across sources, I cannot use standard statistical procedures such as geocoding, and I cannot use analytical software available to me in my office.

9. Specifically, this accommodation does not allow me to analyze systematic factors described in my previous declaration in paragraphs 121, 122, 123, 124, 125, and 126 such as the ethnic demographics of undeliverable qualification questionnaires, the demographics of non-responses, the causes, rates, and geography of non-responses, and the demographics of disqualifications for specific reasons.

10. More importantly, I wanted to limit my time in the Richard B. Russell Federal Building to limit my exposure and risk of acquiring the Covid-19 virus.

11. The process of reviewing the data in the Richard B. Russell Federal Building, making hand notes, and then analyzing the notes in my office takes more total time (both in the Richard B. Russell Federal Building and in my office) and limits the extent of the analysis.

12. The data in the Richard B. Russell Federal Building has no names or addresses or any other information that would allow the identification of any person.

REVISED STATISTICAL ANALYSIS

13. Using the newly licensed Excel software instead of hand counts, I was able to correct the hand counts and update the statistical analysis of the group of 80 persons summoned to potentially become grand jurors in this case as described in paragraphs 49, 60, and 80 of my previous declaration.

14. The group of 80 persons summoned to potentialy become grand jurors in this case is 70.89% White, 24.05% Black or African-American, 0.00% American Indian or Alaska Native, 2.53% Asian, 0.00% Native Hawaiian or Pacific Islander, 1.27% of some other race, and 1.27% multi-racial. The group of 80 is 2.50% Hispanic or Latino. The group of 80 persons is 43.04% Male and 56.96% Female.

15. Using the demographics of the 80 summoned jurors, the Absolute Disparity for Black or African-American persons on the Qualified Jury Wheel is 8.50% under-representation (32.55% minus 24.05%).

16. Using the demographics of the 80 summoned jurors, the Comparative Disparity for Black or African-American persons on the Qualified Jury Wheel is 26.12% under-representation (8.50% divided by 32.55%).

17. Using the newly licensed Excel software instead of hand counts, I was able to correct the hand counts and update the statistical analysis of the undeliverable questionnaires supplied in the data in this case as described in paragraph 120 of my previous declaration.

18. The list of undeliverable questionnaires supplied in the data, Black or African-American persons are over-represented in the group of undeliverables with an Absolute Disparity of 6.14%.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Dated this 30th day of March , 2021

_____Jeffrey Martin